

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF KEVIN GANNON IN SUPPORT OF PLAINTIFF'S  
REQUEST FOR A STATUS CONFERENCE REGARDING DISCOVERY DISPUTE**

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for plaintiff, Singular Computing LLC ("Singular").

2. I submit this declaration in support of Singular's Request for a Status Conference Regarding Discovery Dispute.

3. Attached as Exhibit A is a true and correct copy of Plaintiff's Notice of Deposition to Jeffrey Dean dated July 10, 2020.

4. Attached as Exhibit B is a true and correct copy of Plaintiff's Notice of Deposition to Jeffrey Dean dated March 10, 2021.

5. Attached as Exhibit C is a true and correct copy of Plaintiff's 30(b)(6) Notice of Deposition to Google LLC dated October 2, 2020.

6. Attached as Exhibit D is a true and correct copy of Plaintiff's 30(b)(6) Notice of Deposition to Google LLC dated March 10, 2021.

7. Attached as Exhibit E is a true and correct copy of Plaintiff's Notice of Deposition to Obi Felton dated March 10, 2021.

8. Attached as Exhibit F is a true and correct copy of Plaintiff's Notice of Deposition to Jennifer Roden Wall dated July 10, 2020.

9. Attached as Exhibit G is a true and correct copy of Plaintiff's Notice of Deposition to Jennifer Wall dated March 11, 2021.

10. Attached as Exhibit H is a true and correct copy of e-mail correspondence chain between counsel for Singular and counsel for Google concerning the deposition of David Patterson with the last e-mail dated March 10, 2021.

11. Attached as Exhibit I is a true and correct copy of e-mail correspondence chain between counsel for Singular and counsel for Google concerning deposition scheduling with the last e-mail dated March 23, 2021.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on March 25, 2021 at Boston, Massachusetts.

/s/ Kevin Gannon  
Kevin Gannon